

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

OSWALD WILSON

Plaintiff,
-against-

AMERICAN BROADCASTING CO., INC.,
ABC CO, INC., DISNEY ENTERPRISES, INC.,
THE WALT DISNEY COMPANY,
MICHAEL ZDYRKO, CHARLES ZANLUNGHI,
WILLIAM TRACY, BRENDAN BURKE,
ROBERT SCHLES and
SANDY RANJATTAN.

Dkt. No. 08-cv-1333-LAP

Defendants

**CONSENT MOTION OF PLAINTIFF
FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b), Plaintiff hereby moves for an extension of time to respond to Defendants' Motion to Dismiss through and including June 24, 2008. The purpose of the requested extension is to allow Plaintiff's Counsel to adequately respond to the Motion since Plaintiff's Counsel is otherwise engaged in trial preparation before the ICTR (International Criminal Tribunal for Rwanda). See attached Affirmation of Counsel (Exhibit 1). Without an extension, Plaintiff's response to the Motion to Dismiss is due on May 27, 2008.

Counsel for Defendants has consented to this requested extension of time, provided they are also permitted adequate time to submit reply papers.

WHEREFORE, for good cause shown, Plaintiff respectfully requests that this Court enter an Order extending the time period through and including June 24, 2008 for Plaintiff to timely respond to Defendants' Motion to Dismiss, and through and including July 17, 2008 for Defendants to submit reply papers in support of their Motion. A proposed Consent Order is attached hereto for the Court's convenience.

Respectfully submitted, this 22nd day of May, 2008.

STEVENS, HINDS & WHITE, P.C.

By: /s/Lennox S. Hinds
Lennox S. Hinds (1696574)
Counsel for Plaintiff

TO: Stephen P. Sonnenberg, Esq.
Genevieve C. Nadeau, Esq.
PAUL, HASTINGS, JANOFSKY & WALKER LLP
75 East 55 Street
New York, NY 10022
(212) 318-6000
Counsel for Defendants

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
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**AFFIRMATION OF
COUNSEL**

Dkt. No. 08-cv-1333-LAP

Defendants

LENNOX S. HINDS, Esq., an attorney duly admitted to practice in the courts of this state, affirms under the penalties of perjury that the following is true:

1. I am counsel to plaintiff Oswald Wilson, in the above captioned matter.
2. On May 7, 2008, Defendants filed a Motion to Dismiss with a return date of May 27, 2008.
3. Counsel is currently engaged in trial preparation before the ICTR (International Criminal Tribunal for Rwanda) and, moreover, will be in Tanzania during the week of May 26, 2008.
4. Despite due diligence, Counsel would not be able to adequately defend Plaintiff's interest without an extension of time to respond to Defendants' Motion to Dismiss.

5. Defense counsel has agreed to this extension of time, provided they are allowed adequate time to prepare and submit reply papers, particularly in light of the intervening July 4th holiday.
6. **WHEREFORE**, Counsel respectfully requests for an extension of time till June 24, 2008 to respond to Defendants' Motion to Dismiss, and that the deadline for Defendants to file reply papers in support of their Motion be extended to July 17, 2008.

DATED: NEW YORK, NEW YORK
May 22, 2008

RESPECTFULLY SUBMITTED

/s/Lennox S. Hinds
LENNOX S. HINDS
STEVENS, HINDS & WHITE, P.C.
116 West 111th Street
New York, NY 10026
Tel: (212) 864-4445
Fax: (212) 222-2680

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Defendants

**CONSENT ORDER EXTENDING TIME
TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

Having considered the Consent Motion of Plaintiff for Extension of Time to Respond to Defendants' Motion to Dismiss (the "Motion"), and for good cause shown,

IT IS HEREBY ORDERED that the period of time in which Plaintiff has to respond to Defendants' Motion to Dismiss is extended through and including June 24, 2008;

IT IS FURTHER HEREBY ORDERED that Defendants' reply papers in support of their Motion to Dismiss shall be due on or before July 17, 2008.

SO ORDERED, this _____ day of _____, 2008

Judge, United States District Court
Southern District of New York

Prepared and presented by:

STEVENS, HINDS & WHITE, P.C.

By: /s/Lennox S. Hinds
Lennox S. Hinds (1696574)

116 West 111 Street
New York, NY 10026
(212) 864-4445
Counsel for Plaintiff

Consented to by:

PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: Stephen P. Sonnenberg, Esq.
Genevieve C. Nadeau, Esq.

75 East 55 Street
New York, NY 10022
(212) 318-6000
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing CONSENT MOTIOIN OF PLAINTIFF FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS with the Clerk of the Court, using the CM/ECF system which automatically sent email notification of such filing to the following attorneys of record, each of whom is a registered participant in the Court's electronic notice and filing system:

Stephen P. Sonnenberg, Esq.
Genevieve C. Nadeau, Esq.
PAUL, HASTINGS, JANOFSKY & WALKER LLP
75 East 55 Street
New York, NY 10022

This 22nd day of May, 2008

/s/ Lennox S. Hinds
Lennox S. Hinds